

**FILED**

June 4, 2025

**SEALED**

UNITED STATES DISTRICT COURT  
 WESTERN DISTRICT OF TEXAS  
 SAN ANTONIO DIVISION

CLERK, U.S. DISTRICT COURT  
 WESTERN DISTRICT OF TEXAS  
 By: RR  
 Deputy

**UNITED STATES OF AMERICA**

**Plaintiff**

v

[REDACTED]  
**(3) GUSTAVO EDUARDO SALDANA**

**Defendants.**

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**[18 U.S.C. §§ 371 & 111(b)]**

That from on or about March 31, 2025, in the Western District of Texas, Defendants,

[REDACTED]  
**(3) GUSTAVO EDUARDO SALDANA,**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others, to commit the following offense against the United States: to use a deadly weapon to intentionally and forcibly assault, resist, oppose, impede, intimidate, and interfere with a person designated in Section 1114 of Title 18 United States Code, as a person who was assisting an officer or employee of the United States or any agency in the performance of such duties, in violation Title 18, United States Code, Sections 371 and 111(b).

**COUNT TWO**  
[18 U.S.C. § 924(c)]

That on or about March 31, 2025 in the Western District of Texas, Defendant,

[REDACTED],

did knowingly possess a firearm, namely: a 20 gauge shotgun; in furtherance of a crime of violence as alleged in count one, all violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT THREE**  
[18 U.S.C. § 924(o)]

That on or about March 31, 2025 in the Western District of Texas, Defendants,

[REDACTED]

**(3) GUSTAVO EDUARDO SALDANA,**

knowingly combined, conspired, and agreed with others to possess firearms in furtherance of a crime of violence as alleged in count one, all violation of Title 18, United States Code, Section 924(o).

**COUNT FOUR**  
[18 U.S.C. § 922(g)(1)]

That on or about March 31, 2025, in the Western District of Texas, Defendant,

[REDACTED],

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm: a Western Field KSE-1, 20 gauge shotgun,

the firearm had travelled in interstate and foreign commerce, in violation of 18 U.S.C. §922(g)(1).

A TRUE BILL.

[REDACTED]  
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FOREPERSON OF THE GRAND JURY

JUSTIN R. SIMMONS  
UNITED STATES ATTORNEY

BY:

  
For MATTHEW LATHROP  
Assistant United States Attorney